

(RPG)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**MOTION FOR DETENTION HEARING**

**NOW COMES** the United States and moves for the pretrial detention of the defendant, pursuant to 18 U.S.C. § 3142(e) and (f). In support of the motion, the United States alleges the following:

1. Eligibility of Case. This case is eligible for a detention order because case involves (check all that apply): \_\_\_\_\_

\_\_\_\_ Crime of violence (18 U.S.C. § 3156)

\_\_\_\_ Maximum sentence life imprisonment or death

\_\_\_\_ 10+ year drug offense

\_\_\_\_ Felony, with two prior convictions in above categories

\_\_\_\_ Minor victim

X Possession/ use of firearm, destructive device or other dangerous weapon

\_\_\_\_ Failure to register under 18 U.S.C. § 2250

X Serious risk defendant will flee

\_\_\_\_ Serious risk obstruction of justice



2. **Reason For Detention**. The court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

Defendant's appearance as required  
 Safety of any other person and the community

3. **Rebuttable Presumption**. The United States will/will not invoke the rebuttable presumption against defendant under § 3142(e). (If yes) The presumption applies because (**check one or both**):

Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c), or a federal crime of terrorism, or a specified offense (\_\_\_\_\_ ) with minor victim

Previous conviction for "eligible" offense committed while on pretrial bond

4. **Time For Detention Hearing**. The United States requests the court conduct the detention hearing,

At first appearance

After continuance of 3 days (not more than 3).

5. **Temporary Detention**. The United States request the temporary detention of the defendant for a period of \_\_\_\_\_ days (not more than 10) so that the appropriate officials can be notified since (**check 1 or 2, and 3**):

1. At the time the offense was committed the defendant was:

(a) on release pending trial for a felony;

(b) on release pending imposition or execution of sentence, appeal of sentence or conviction, or completion of sentence for an offense;

(c) on probation or parole for an offense.

2. The defendant is not a citizen of the U.S. or lawfully admitted for permanent residence.

3. The defendant may flee or pose a danger to any other person or the community.

6. **Other Matters.**

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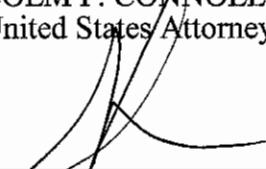
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DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2007.

Respectfully submitted,

COLM F. CONNOLLY  
United States Attorney

BY:

  
Shawn A. Weede  
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